

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: :
: **CHAPTER 7**
NEW YORK CITY VACATIONS, INC. :
: **CASE NO. 5:20-01790**
Debtor :

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**TRUSTEE'S MOTION TO OPERATE ON A LIMITED BASIS PURSUANT TO 11
U.S.C. §704(a)(8) and 11 U.S.C. §721**

TO THE HONORABLE ROBERT N. OPEL, II, BANKRUPTCY JUDGE:

1. On June 10, 2020, applicant was appointed Trustee in the above matter.
2. Applicant wishes to operate the above-referenced Debtor on a limited basis in order to obtain refunds to the estate which will be paid back by various entities over the next year as events are cancelled.
3. It is in the best interest of the estate to operate on a limited basis in order to maximize the collection of funds that will be available to creditors.
4. To assist him in the limited operations of the Debtor, Applicant wishes to employ certain employees of the Debtor, New York City Vacations, Inc. on an as-needed, limited basis, as of the date of this application.
5. The Trustee currently has enough funds on hand to pay all wages and taxes that will be incurred by the estate with reference to the limited employment of certain employees.
6. The Trustee wishes to employ the following employees on an as needed, limited basis as set forth herein:
 - Maria Jardines, Financial Manager/Bookkeeper – to be employed approximately one hour per day at the rate of \$27.00 per hour
 - David Blaker, IT – to be employed on an as needed basis at the rate of \$24.74 per hour – There is currently no need for this employee but he would be needed should there be an IT issue

- Anna Boltz, Product and Marketing Manager – to be employed on an as needed basis, if necessary, to assist with refunds, disbursements and accessing specific information at a rate of \$25.49 per hour

WHEREFORE, applicant prays that he be authorized to operate New York City Vacations, Inc. on a limited basis; and further

that he be authorized to employ certain of the Debtors employees on an as needed, limited basis in order to do so as of the date of this Application, and

that he have such other and further relief as is just and proper.

Dated: June 30, 2020

/s/ Robert P. Sheils, Jr.
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